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VIA E-MAIL

To: [opt.ncic@epa.gov](mailto:opt.ncic@epa.gov) , [chem.rtk@epa.gov](mailto:chem.rtk@epa.gov)

Mr. Mark W. Townsend, Chief  
HPV Chemicals Branch  
OPPTS / EPA

Subject: HPV Test Plan and Robust Summaries for HPV Challenge Program:  
Perfluorocompounds C5-C18

Dear Mr. Townsend:

3M appreciates EPA's comments on the revised test plan and robust summaries for perfluoro-compounds, C-5-C18 dated March 26, 2007. In response to EPA's questions and comments, we have added or revised the following content to this submission. These are provided with this letter as three attachments:

- Response to comments: 3M has specifically addressed the questions and comments noted in the March 26 letter from EPA. The original format in which the questions were posed was used as a template for the response.
- Robust summary and test plan: 3M has revised the HPV robust summary and test plan submission to address the deficiencies noted by EPA.
- Perfluorooctane fugacity model: As referenced in the response to comments, a copy of the fugacity model output for perfluorooctane (modeling additional release scenarios) is included with this submittal.

Should there be any questions concerning this submission, please contact me at (651) 736-2908 or via the mailing addresses below.

Sincerely,

Michael J. Falco, Manager  
3M Materials EHS&R  
3M Center, Building 236-1B-10  
St. Paul, MN 55144  
651/736-2908  
[mjfalco1@mmm.com](mailto:mjfalco1@mmm.com)

cc: K. T. Werner - 236-1B-10